

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE:	:		
April N. Sycz	:		
	:	Debtors	Chapter 13
	:		
April N. Sycz	:		Bankruptcy No. 18-13197 AMC
	:	Movant	
v.	:		
	:		
PHH Mortgage Corporation	:		
	:	Respondent	
	:		
	:		
	:		
	:		

**RESPONSE OF PHH MORTGAGE CORPORATION TO MOTION FOR AUTHORITY
TO SELL REAL PROPERTY FREE AND CLEAR OF LIENS AND ENCUMBRANCES**

Respondent, PHH Mortgage Corporation, by and through its attorneys, Phelan Hallinan Diamond & Jones, LLP, hereby responds to MOTION FOR AUTHORITY TO SELL REAL PROPERTY FREE AND CLEAR OF LIENS AND ENCUMBRANCES and in support thereof, avers as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Denied. Respondent is without information or knowledge sufficient to form a belief as to the truth of the within averment.
5. Admitted.
6. Admitted.
7. Admitted.
8. Denied. Respondent is without information or knowledge sufficient to form a belief as to the truth of the within averment.

9. Denied. Respondent is without information or knowledge sufficient to form a belief as to the truth of the within averment. In further response, Respondent insists that it be paid in full subject to a proper payoff quote at the time of closing or that any sale short of full payoff will be subject to PHH Mortgage Corporation's final approval.

10. Denied. Respondent is without information or knowledge sufficient to form a belief as to the truth of the within averment.

11. Denied. Respondent is without information or knowledge sufficient to form a belief as to the truth of the within averment.

12. Denied. Respondent is without information or knowledge sufficient to form a belief as to the truth of the within averment. In further response, Respondent insists that it be paid in full subject to a proper payoff quote at the time of closing or that any sale short of full payoff will be subject to PHH Mortgage Corporation's final approval.

WHEREFORE, Respondent, PHH Mortgage Corporation respectfully requests that this Honorable Court deny MOTION FOR AUTHORITY TO SELL REAL PROPERTY FREE AND CLEAR OF LIENS AND ENCUMBRANCES in its entirety without the following provision:

- 1) Debtor shall include in the Order that either **PHH Mortgage Corporation** will be paid in full subject to a proper payoff quote at the time of closing or that any sale short of full payoff will be subject to **PHH Mortgage Corporation's** final approval.
- 2) Closing is required within 30 days of the payoff quote date or a new payoff is required within 30 days of closing.

Respectfully submitted,

Date: August 4, 2020

/s/ Thomas Song, Esquire
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